

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

IN RE: : CASE NO. 17-13071
 : CHAPTER 13
DAWN K. WARMAN :
 : JUDGE BETH A. BUCHANAN
DEBTOR(S) :
 : TRUSTEE'S OBJECTION
 : TO CONFIRMATION

Comes now the Chapter 13 Trustee, Margaret A. Burks and files this objection to the Plan filed by debtor(s). The Trustee objects for the reasons stated herein. Requested documents have not been provided.

- a) As of 10/30/17 continued 341 meeting, expected Motions have not been filed in Domestic Relations Court. As described in the Trustee's Report (Doc. 25), and discussed at the October 16 Meeting of Creditors, debtor's Plan will be funded in part by contribution from ex-spouse, expected to be order by the DR Court. Until the contribution is ordered, the Plan's feasibility is not determined. 11 U.S.C. Sec. 1325(a)(6)
- b) Domestic relations Counsel was paid in series of retentions - is fourth payment necessary to complete division of real property? If so, who will pay? If so, Application to Appoint Counsel?

The Trustee requests that the Court uphold her objection.

Respectfully submitted,

/s/ Margaret A. Burks, Esq.
Margaret A. Burks, Esq.
Chapter 13 Trustee
Attorney Reg. No. OH 0030377

Francis J. DiCesare, Esq.
Staff Attorney
Attorney Reg. No. OH 0038798

Karolina F. Perr, Esq.
Staff Attorney
Attorney No. OH 0066193

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Objection to Confirmation was served (i) electronically on the date of filing through the court's ECF System on all ECF participants registered in this case at the email address registered with the court and (ii) by ordinary U.S. Mail on November 1, 2017 addressed to:

Dawn K. Warman
debtor(s)
7724 Hunters Trail
West Chester, Ohio 45069

/s/Margaret A. Burks, Esq.
Margaret A. Burks, Esq.

Francis J. DiCesare, Esq.

Karolina F. Perr, Esq.

UNITED STATES BANKRUPTCY COURT
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IN RE: : CASE NO. 17-13071
 : CHAPTER 13
DAWN K. WARMAN : JUDGE BETH A. BUCHANAN

DEBTOR(S) :
 : **NOTICE OF OBJECTION**
 : **TO CONFIRMATION**

The Chapter 13 Trustee, Margaret A. Burks, has filed papers with the court objecting to the confirmation of the above-referenced case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in objection to confirmation, or if you want the court to consider your views on the objection, November 16, 2017, at the United States Bankruptcy Court, Atrium II, Suite 800, 221 East 4th Street, Cincinnati, Ohio 45202.

You may also file a Response explaining your position.

If you mail your response to the court for filing, you must mail it early enough so the court will receive it before the confirmation hearing.

If you file a Response, you must also mail a copy to:

Margaret A. Burks
Chapter 13 Trustee
600 Vine Street
Suite 2200
Cincinnati, Ohio 45202

U.S. Trustee
36 East 7th Street
Suite 2030
Cincinnati, Ohio 45202

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the objection and may enter an order granting that relief.

Date: November 1, 2017

/s/ Margaret A. Burks, Esq.
Margaret A. Burks, Esq.